



**LOS ANGELES COUNTY
COMMISSION ON HUMAN RELATIONS
TRANSFORMATIVE JUSTICE INITIATIVE**



Esteemed Scholars and Researchers of the United Nation’s Independent International Expert Mechanism to Advance Racial Justice and Equality in Law Enforcement:

We at the Los Angeles County Commission on Human Relations (LACCHR) are honored to respond to your Call for Input. Our Executive Director Robin Toma has a long and storied history working to advance human rights across the United States and has built our organization to respond to the international standards codified by the United Nations.

This submission is informed by our programmatic work, as well as gleanings from our seminal report, “Redefining Policing with Our Community.” The recommendations and best practices therein source from a variety of voices – families and individuals directly impacted by police violence, public forums held for residents from each of Los Angeles County’s five Supervisorial Districts, nonprofit agencies dedicated to transforming public safety, law enforcement agencies, and scholars who have dedicated their lives to the study of procedural policing practices. The report was five years in the making, and today serves as the foundation for the Los Angeles County Commission on Human Relations Transformative Justice Initiative’s strategies and recommendations.

The complete “Redefining Policing With Our Community” report can be accessed at: <https://assets-us-01.kc-usercontent.com/0234f496-d2b7-00b6-17a4-b43e949b70a2/ad3fc119-eeb-4abe-8dd9-e64e91ed3df6/Redefining-Policing-With-Our-Community-ECopy.pdf>.

A video summary of the report featuring our Committee Chair Isabelle R. Gunning can be accessed at: <https://vimeo.com/404844532>.

1. What are the laws, policies, guidelines, and procedures compliant with the international legal framework governing the use of force and firearms by law enforcement officials?

We interpret “the laws, policies, guidelines, and procedures that are compliant with the international legal framework governing the use of force and firearms by law enforcement officials” to be those that prioritize the use of non-violent means and non-lethal weapons, require a clear warning before the use of force, and establish mechanisms for review and accountability of any use of force.

The following recommendations from our report correlate to the laws, policies, guidelines, and procedures that are compliant with the international legal framework governing the use of force and firearms by law enforcement officials.



Strategic Aim #2 – Revise Use-of-Force Policies and Practices

Current use-of-force policies authorize practices too often lead to serious harm and loss of life. Protocols and mechanisms should be developed that will safeguard the lives of community members and responding officers.

Recommendation 4 – Change state law to require law enforcement agencies to implement policies to exhaust all other acceptable measures, including self-identification, de-escalation techniques, and non-lethal tactics, before resorting to use-of-force.



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Recommendation 5 – Assign use-of-force investigations to independent special prosecutors housed outside of law enforcement agencies and the district attorney’s office.

Recommendation 6 – Make information on use-of-force incidents and assault-on-officer incidents, including all relevant geographic and demographic data, publicly available and accessible; this information should also be reported at public forums such as oversight meetings, town halls, etc.

2. What are the promising initiatives and positive or good practices being recommended to address systemic racism in law enforcement and the criminal justice systems beyond individual violations, including in an institutionalized police culture?

Systemic racism in Los Angeles County policing can be described as a) the disproportionately large incarceration rates of African American and Latino populations when compared to their overall percentages of the population, and b) a cycle of civil unrest that exists in Los Angeles County which is triggered by police misconduct in these communities.

LACCHR recommends several initiatives and practices to address systemic racism in law enforcement and the criminal justice system, beyond individual violations and including institutionalized police culture. These include:

- a. Requiring Implicit Bias Training: The LACCHR recommends that law enforcement agencies should require implicit bias training for all officers. This training can help officers recognize and address their own unconscious biases, understand the mired history of policing in the United States, and promote fair and equitable policing practices.
- b. Requiring Cultural Competency Training: The LACCHR recommends that law enforcement agencies should require cultural competency training for all officers. This training can help officers understand and respect diverse cultures and communities and promote positive interactions between law enforcement and the communities they serve.
- c. Implementing Restorative Justice Programs: The LACCHR recommends that law enforcement agencies should implement restorative justice programs that focus on repairing harm and restoring relationships between law enforcement and the communities they serve. These programs can promote community healing and reduce recidivism rates.
- d. Implementing Community Policing Strategies: The LACCHR recommends that law enforcement agencies should implement community policing strategies that involve collaboration with community members to identify and address local crime and safety issues. This can help to promote public trust and proactive relationships between law enforcement and the communities they serve.
- e. Addressing Hate Crimes/Incidents: In learning to recognize and address hate crimes and incidents, officers should be trained in the definitions laid out in CA Assembly Bill 1064, which designates protected classes of people. This includes disability, gender, nationality, race or ethnicity, religion,



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sexual orientation, and association with a person or group with one or more of these actual or perceived characteristics.

Specific protocols that will improve police-community relations and reduce implicit bias, triggering events and behaviors are outlined in the following section, highlighting recommendations from our report.



Strategic Aim #5 – Improve Police Training

Create training environments for recruits and officers which promote holistic portrayals of the communities they serve, including focus on preventing bias by proxy.

Recommendation 17 – LASD must end the practice of assigning new deputies only to custody duty in jails.

Recommendation 18 – Collaborate with community groups to design and facilitate police trainings.

Recommendation 19 – Mandate the training of police officers on the purposes, processes, and target populations of relevant community resources to facilitate effective referrals as alternatives to arrest.

Recommendation 20 – Mandate the training of police officers on trauma-informed approaches for interactions with the public.

Recommendation 21 – Integrate evaluation metrics for trainings to ensure intended behavior change.

Recommendation 22 – Mandate ongoing training (at least every two years) of patrol officers, dispatchers, and diversion specialists on effective ways to a) engage people with substance use disorders, b) assist people experiencing mental health challenges, c) use culturally appropriate de-escalation techniques, d) integrate ethics and integrity in their work, e) recognize and address hate crimes and incidents, and f) eliminate, or at least manage, their own implicit and explicit racial and identity biases.

3. What are the recommended promising initiatives and positive or good practices on prevention and accountability measures for human rights violations by law enforcement? These may include oversight, monitoring, and reporting of violations, gathering and publishing comprehensive disaggregated data, human rights training, recruitment, and retention processes, and awareness-raising?

Of the many initiatives to prevent and address human rights violations by law enforcement, we feel the most significant is the creation of localized civilian review and oversight commissions. Ideally empowered with subpoena powers to review officer involved shootings, such oversight commissions will radically transform accountability, giving power to localities to set boundaries for those policing them. Such local civilian sovereignty is still in the works, but the necessary infrastructure to connect a central governing body to such commissions is already in place. Notable examples of local civilian oversight commissions exist in the cities of Compton and Pasadena, which are in Los Angeles County. Additionally, our report reflects and uplifts several initiatives and practices with the following strategic aim and related recommendations.



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Strategic Aim #3 – Strengthen Civilian Review and Oversight

Authorize community members to oversee policing issues, providing checks and balances necessary for accountability and trust.

Recommendation 7 – Each law enforcement jurisdiction without a civilian oversight body should establish one to provide input on policies and practices, including hiring and disciplinary decisions.

Recommendation 8 – Ensure that all civilian oversight bodies have the necessary authority to perform their mission, including subpoena power and the power to censure and/or discipline.

Recommendation 9 – Ensure that membership selection processes for civilian oversight bodies include community nominations and designate seats for people who have been justice-involved and impacted family members.

Recommendation 10 – LA County Board of Supervisors should mandate and resource production of an annual report documenting and assessing policing and human relations in LA County, including monitoring the progress of implementation of this report’s recommendations in consultation with the LA County Office of the Inspector General and related bodies; this report should involve all local law enforcement jurisdictions and incorporate a legislative analysis as well as highlight data on use-of-force incidents and police stops.

Additionally, the LACCHR promotes the following components to imbed human rights priorities into police-community relations.

- a. Creation of the Sheriff Civilian Oversight Commission: The commission is an independent body that aims to improve transparency and accountability in the LASD, investigate complaints of misconduct and use of excessive force by deputies, and ensure that the LASD follows the law and respects human rights.
- b. Collection and publication of comprehensive disaggregated data: The LACCHR collects and publishes data on hate crimes and bias-motivated incidents in Los Angeles County. This annual Hate Crime Report helps identify trends and patterns in hate crimes and incidents, informs policy and resource allocation, and raises public awareness about hate.
- c. Human rights training for law enforcement: The LACCHR provides human rights training for law enforcement officers to help them understand and respect human rights and improve their interactions with the public. The training covers topics such as the use of force, racial profiling, and cultural sensitivity.
- d. Recruitment and retention processes: The LACCHR promotes the recruitment and retention of law enforcement officers who reflect the diversity of Los Angeles County's population. It also encourages law enforcement agencies to implement policies and practices that support the professional development and well-being of officers. Finally, local civilian oversight commissions



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should have some say in who comes into their neighborhoods, offering relevant trainings to understand local history and stakeholders.

- e. Public awareness-raising: The LACCHR conducts public awareness-raising campaigns through its premier project LA vs. Hate (www.lavshate.org), to promote tolerance, diversity, and respect for human rights. These campaigns aim to raise public awareness about hate crimes, discrimination, and other human rights violations, and to promote a culture of human rights in Los Angeles County.

All of these components lead to embedding sustainable human rights priorities into local law enforcement-community relations.

4. What does the Los Angeles County Commission on Human Relations recommend as good practices, challenges and lessons learned on alternative methods of policing, strengthening institutional oversight, and closing trust deficits between law enforcement and civilians?

As mentioned in our previous responses, our report reflects and uplifts community involvement, accountability mechanisms, public education programs, and internal trainings and protocol improvements for law enforcement. This includes:

Enhancing Community Based Alternatives to Law Enforcement: Increasing funding to community-based initiatives to pro-actively address core issues of poverty includes education, health and youth development.

Community Policing: Building relationships between law enforcement and the communities they serve by through collaborative problem-solving involves officers working with community members to identify and address public safety issues and build trust.

Restorative Justice: This approach emphasizes repairing harm and rebuilding relationships between offenders, victims, and the community. It involves holding offenders accountable while providing them with opportunities to make amends and improve their behavior.

Civilian Oversight: Establishing independent civilian oversight bodies to monitor law enforcement agencies, investigate complaints of misconduct, and make recommendations for policy changes is a central pillar. Locally, the Pasadena Community Police Oversight Committee, strengthened with an Independent Police Auditor, is a best practice. For information on the City of Pasadena's Community Police Oversight Commission visit: <https://www.cityofpasadena.net/commissions/community-police-oversight-commission>.

Not yet mentioned is a long-term commitment to establishing a culture of wellbeing and harm-reduction. We feel strongly that the answer to moving forward to rebuild our community connections and empower our communities to prevent, address, and heal conflict and harm comes through creating spaces for meaningful, long-term involvement of all stakeholders.

Ultimately, we seek to move outside the traditional boxes of dialogue which all too often end in familiar stalemates, and into a restorative, healing environment where those who are impacted can share their



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experiences, influence attitudes to build empathy to overcome long term profiling and stereotypes, and, with patience, restore communication to establish due process of law and a working balance of power.

What is certain is that untreated anxiety, PTSD, depression, and other mental health indicators undermine any protocols to limit negative police-community interactions. Healing circles, PTSD treatment, and regular mental health evaluations, are all needed to unearth the often-invisible root causes of violence and particularly, police involved violence. To accomplish this, we recommend the following items:



Strategic Aim #9 – Establish a Culture of Wellbeing and Harm-Reduction in LA County

Using restorative practices, we should engage in healing generational trauma and balancing power to foster the justice that is essential to genuine peace and making LA County whole.

Recommendation 32 – Convene groups of relevant stakeholders to create innovative models that define public safety as a cooperative community endeavor rather than merely an assignment to enforce laws.

Recommendation 33 – Engage community stakeholders in developing a Countywide Community Wellbeing Vision and Rights Declaration that will be incorporated into the County charter, prominently displayed in County facilities, and disseminated via a public awareness campaign.

Recommendation 34 – Establish restorative community circles throughout LA County to envision and apply new paradigms of community wellbeing.

In conclusion, we feel that the traditional roles law enforcement has attempted to fill in meeting the challenges before us is a key point of debate. We see clearly, however, that only with full participation of all stakeholders can comprehensive change occur. The insight and participation of law enforcement has been key to this process and will be critical moving forward. Dividing lines or not, we need a table at which everyone can sit to frame comprehensive, workable, breakthrough solutions to the entrenched cycle of civil unrest that periodically engulf our communities.

More than 50 years after the Watts Rebellion and more than 25 since the Rodney King Uprising, we are reminded that many of the social conditions that led to these eruptions persist. It is clear that the root causes of repeated violence outbreaks are not the sole responsibilities of law enforcement. Indeed, it is an oversight of government that has placed law enforcement in untenable situations. Officers have become, by default, catalysts for fear and anger rather than safety and hope.

In listening to the various voices of our County, we have heard of the decades of organizing in South and East LA to create community-based accountability. We heard law enforcement leaders discussing ways they have revised what they do and how. We heard the call for transparency in newer forms, some of which have come to fruition since the start of this project. We envision a County where the social consequences of poverty and racism are addressed by the agencies tasked to do so, not by law enforcement, and one where the community is fully engaged in designing their own public welfare safety nets.



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For more information on the report, our Transformative Justice Initiative, or the LACCHR's work in general, please visit our website (<https://hrc.lacounty.gov>) or contact Senior Staff Pierre Ivan Arreola at PArreola@hrc.lacounty.gov and Joshua Parr at JParr@hrc.lacounty.gov.